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April 15, 2005

Mr. Ronald Allen
California Regional Water Quality Control Board
North Coast Region
5550 Skyline Blvd., Suite A
Santa Rosa, CA 95403

RE: **Quarterly Monitoring and Status Report – First Quarter 2005**
SECOR Project No.: 77CP.60009.01.0140

Dear Mr. Allen:

On behalf of ConocoPhillips, SECOR International Incorporated is forwarding the quarterly summary report for the following location:

Bulk Plant	**Location**
Former ConocoPhillips Bulk Plant # 0140	255 State Highway 101 South Crescent City, California

If you have questions or comments regarding this quarterly summary report, please do not hesitate to contact me at (916) 861-0400.

Sincerely,
SECOR International Incorporated

Thomas M. Potter
Staff Scientist

Attachments: SECOR's *Quarterly Summary Report* dated April 14, 2005
Attachment 1 – TRC *Quarterly Monitoring Report January through March, 2005* dated April 5, 2005

cc: Mr. Thomas Kosel, ConocoPhillips
Mr. Chris Renner, Renner Petroleum
Mr. Donald Kelly, California Department of Fish & Game
Mr. Leon Perrault, Del Norte County Department of Environmental Health

QUARTERLY SUMMARY REPORT
FIRST QUARTER 2005

Former ConocoPhillips Bulk Plant #0140
255 State Highway 101 South, Crescent City, California

City/County ID #: Crescent City

County: Del Norte

PREVIOUS ASSESSMENT

The former Unocal Bulk Plant #0140 in Crescent City, California historically operated as a bulk plant for the storage and distribution of petroleum products including gasoline, diesel, and motor oil. Four Aboveground Storage Tanks (ASTs) and two underground spill containment tanks were used at the site (Figure 2).

On July 13, 1990, Applied GeoSystems supervised the removal of two 550-gallon "slop" tanks. Soil and groundwater samples were collected from the tank cavities (Applied GeoSystems, November 1990).

In July of 1990, Applied GeoSystems advanced 22 soil borings (B-1 through B-22) at the site. Soil samples were collected from several of the borings. Petroleum hydrocarbons were detected in soil from several samples (Applied GeoSystems, December 1990).

In August of 1990, Applied GeoSystems oversaw the excavation and disposal of approximately 740 cubic yards of soil (Applied GeoSystems, December 1990). Excavation extents are shown on Figure 2.

In March of 1991, six soil borings (B-23 through B-28) were installed and converted to groundwater monitoring wells (MW-1 through MW-6) (RESNA, 1991).

In June of 1994, RESNA conducted an environmental investigation to further evaluate soil and groundwater conditions in the vicinity of the plant. Five soil borings (B-29 through B-33) were advanced during the investigation (RESNA, 1994).

Results from both the site investigations and quarterly groundwater monitoring reports indicated that soil and groundwater contamination existed at the boundaries of the property and (potentially) off site, toward the west.

On May 19, 2000, SHN supervised the installation of monitoring well MW-7 on the Elk Creek Wildlife Refuge property located west of the bulk plant (SHN, 2000).

In March 2001, SHN supervised the installation of seven soil borings (B-101 through B-107) and one monitoring well (MW-8) (SHN, 2001).

In May 2001, a tidal study was conducted at the site (SHN, October 2001). Based on the data collected, the tide has a very minimal influence on groundwater at the site.

On December 9 and 10, 2002, SHN supervised the installation of eight Membrane Interface Probe (MIP) borings and seven direct push borings with temporary well points (SHN, February 2003). The objective of the investigation was to assess soil and groundwater conditions in the vicinity of the Oil/Water Separator (OWS). MIP borings indicated significant concentrations of petroleum hydrocarbons were present only in the immediate vicinity of MIP boring #1. Petroleum-impacted soil and groundwater were detected in samples from the areas near the OWS and the former underground storage tank. One groundwater sample was collected from approximately 20 feet Below Ground Surface (bgs) to define the vertical extent of groundwater contamination (B-207). No constituents were detected in the groundwater sample collected from B-207.

On October 13-16, 2003, SHN supervised Northcoast Environmental Construction (NEC) in the removal of the existing OWS and excavation of petroleum impacted soils around the OWS (SHN, November 2003). Soil samples were collected from the sidewalls and floor of the excavation pit. Approximately 66.5 tons of soil (approximately 72 cubic yards) were removed from the site.

Before the excavation was backfilled, approximately 500 pounds of Oxygen Releasing Compound (ORC®) were placed into the excavation cavity. The ORC® was mixed with potable water in the backhoe bucket and placed into the excavation cavity. After the ORC placement, the excavation cavity was lined with geofabric and bioventing piping was installed. Class II drain rock was placed on the geofabric, and the OWS and biovent piping were installed. Class II drain rock was used to fill the excavation cavity to a depth of approximately 3 feet BGS. The geofabric was used to line the top of the drain rock, and the remainder of the excavation cavity was filled with native material and compacted. The area around the OWS was completed with aggregate base material, and the remainder was graded, seeded, and covered with straw.

SENSITIVE RECEPTORS

SHN performed a sensitive receptor survey within a 1,000-foot radius from the site location. SHN investigated the area for the presence of water wells, sensitive environmental habitats, and potential health and safety issues associated with the property. Data was acquired from site visits, United States Geological Survey 7.5-minute series topographic maps (Crescent City and Sister Rocks), and the California Department of Water Resources (DWR).

The DWR well search did not identify any domestic wells within 1,000 feet of the site. The site receives water from wells located in the Smith River, which is located approximately 10 miles north of the site.

Underground utility lines are present beneath the site. Depths of utility trenches are inferred to be approximately 2.0-3.0 feet bgs. Previously reported monitoring well data from the site indicated the depth to groundwater to be approximately 3.0-5.5 feet BGS (TRC, June 2004). Therefore, utility trenches may act as preferential pathways during times of a high groundwater table.

Surface bodies of water within the 1,000-foot radius include Elk Creek, which is located approximately 70 feet west of the site. Elk Creek flows south through the Elk Creek Wildlife Refuge and west of the site location and enters the Pacific Ocean approximately

1,300 feet downstream from the site location. Sensitive environmental habitats may exist along Elk Creek.

Historically, groundwater has flown to the east.

MONITORING AND SAMPLING

The site has been monitored and sampled since 1st quarter, 1991. Between 1st quarter 1991 to 4th quarter 1995, the site has been monitored/sampled quarterly. From 2nd quarter 1996 to fourth quarter 2003, the site has been sampled semi-annually. From the 2nd quarter 2004 to present the site has been sampled on a quarterly basis. Currently, 8 monitoring wells, MW-1 through MW-8, and three sample points located in Elk Creek (EC-1, EC,2, and EC-4) are monitored and sampled quarterly. Starting in the second quarter 2005, the sampling program will be on a semi-annual basis. Samples are analyzed for total petroleum hydrocarbons with gasoline distinction (TPHg), benzene, toluene, ethyl benzene, and total xylenes (collectively BTEX), by Environmental Protection Agency (EPA) Method 8015M. Samples were also analyzed for fuel oxygenates and total petroleum hydrocarbons with diesel distinction (TPHd) by EPA method 8260B.

REMEDATION STATUS

Currently there is no active remediation system operating at this site. However, SHN Consulting Engineers & Geologists, Inc. (SHN) submitted a Corrective Action Plan recommending ozone sparging at the site. The system is currently in the design process and is anticipated to be installed during the second or third quarter of 2005.

CHARACTERIZATION STATUS

Contamination in soil and groundwater has been adequately delineated.

RECENT SUBMITTALS/CORRESPONDENCE

SHN submitted Corrective Action Plan dated October 1, 2004

WASTE DISPOSAL SUMMARY

The volume of purged groundwater generated and disposed of during the quarterly groundwater monitoring event will be reported in TRC's quarterly report.

DISCUSSION

During the first quarter 2005, depth to groundwater in the eight on and off-site wells ranged from approximately 2.31 feet to 4.76 feet bgs, which is consistent with historical levels that have ranged between depths of 1.15 feet and 6.00 feet bgs. Groundwater elevations in the site wells this quarter ranged from approximately 3.58 feet above mean sea level (MSL) to 4.89 feet above MSL. Groundwater flow beneath the site during the first quarter 2005 was northwesterly at a hydraulic gradient of 0.006 ft/ft, which is consistent with the historical groundwater flow direction beneath the site, which has predominantly toward the northwest. A regional groundwater elevation contour map was

prepared by TRC using monitoring data collected on January 31, 2005, and is presented in Attachment 1.

As stated above, the dissolved plume is limited to area of well MW-2, which was installed south of the ASTs. During the first quarter 2005, MW-2 contained 170 µg/L of TPHd. All other constituents were below laboratory reporting limit. Concentrations within the well appear to be stable. The dissolved plume remains defined by low or non-detectable concentrations of hydrocarbons in downgradient wells MW-7 and MW-8 to the northwest, cross gradient wells MW-1 and MW-6 to the east and south respectively and upgradient well MW-5 to the south east. Samples EC-1 and EC-2 taken from Elk Creek had minor hits of TPHd at 100 µg/L and 65 µg/L respectively.

Upgradient (southeast) from the site is a former Texaco station. During the coordinated sampling sampling event with Gettler-Ryan in January, 2005, groundwater samples from monitoring wells TW-2, TW-3, and TW-4, which are located downgradient of the Texaco station in the southeast corner of the site, exhibited concentrations of TPHd, TPHg, and benzene at maximum concentrations of 3500 ug/L, 550 ug/L, and 0.9 ug/L respectively.

THIS QUARTER ACTIVITIES (First Quarter 2005)

1. TRC conducted quarterly groundwater monitoring and sampling.
2. Waiting on CAP approval from regulatory agency.
3. Lead Consultant Change from SHN to SECOR International, Inc.

NEXT QUARTER ACTIVITIES (Second Quarter 2005)

1. TRC to conduct coordinated semi-annual groundwater monitoring and sampling.
2. SECOR to implement CAP pending regulatory approval.
3. Prepare and submit quarterly summary report which will include quarterly monitoring and sampling data (TRC).

ATTACHMENT 1
TRC QUARTERLY MONITORING REPORT – JANUARY THROUGH MARCH 2005

Quarterly Summary Report
Former ConocoPhillips Bulk Plant # 0140
255 State Highway 101 South
Crescent City, CA
April 15, 2005

SEE TRC

1Q05 QMR